

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS
LIABILITY LITIGATION

MDL No. 13-2419
Dkt. No 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:

All Cases Against the Saint Thomas Entities

**MOTION OF DEFENDANTS SAINT THOMAS HEALTH, SAINT THOMAS NETWORK,
AND ST. THOMAS HOSPITAL TO DISSOLVE PROTECTIVE ORDERS AND LIFT
STAYS BARRING CERTAIN DEPOSITIONS**

The Saint Thomas Entities¹ hereby move to dissolve the protective order barring depositions of the NECC Insiders; Joseph Connolly and John Notarianni; and the U.S. Food and Drug Administration. Alternatively, the Saint Thomas Entities request that the Court stay the bellwether trials in this MDL until after a verdict or plea is reached in *U.S. v. Cadden*. In support thereof, the Saint Thomas Entities rely on their Memorandum of Law, filed herewith, and all documents incorporated by reference therein.

WHEREFORE, the Saint Thomas Entities request that the protective order described above be dissolved, and that the relief requested in the Memorandum of Law filed herewith be granted.

1 Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network.

Dated May 6, 2016

SAINT THOMAS WEST HOSPITAL,
FORMERLY KNOWN AS ST. THOMAS
HOSPITAL, SAINT THOMAS
NETWORK, AND SAINT THOMAS
HEALTH

By their attorneys,
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*Appearing *Pro Hac Vice*

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(a)(2), the Saint Thomas Entities conferred with the affected parties prior to the filing of the original motions seeking the discovery at issue and are aware of no change in the parties' positions.

/s/ Sarah P. Kelly
SARAH P. KELLY

CERTIFICATE OF SERVICE

This certifies that a true and accurate copy of the foregoing was served on all parties of record by virtue of the Court's electronic filing system this 6th day of May, 2016.

/s/ Sarah P. Kelly
SARAH P. KELLY